

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's)	WT Docket No. 99-328
Rules to Ensure Compatibility)	
With Enhanced 911 Emergency)	
Calling Systems)	
To:		The Commission

**COMMENTS OF NENA
IN RESPONSE TO THE 9-1-1 CALL PROCESSING METHOD
PROPOSED BY NOKIA**

The National Emergency Number Association ("NENA") hereby submits the following comments regarding a submission filed with WTB by Nokia, Inc. on October 27, 1999 proposing a revised 9-1-1 call completion method for Nokia's multi-mode products, including both digital and analog transmission technologies.

NENA is the premier 9-1-1 organization in the nation and is solely devoted to 9-1-1. It represents over 6,000 professionals. NENA sets the 9-1-1 standards working with the Public Safety Answering Points ("PSAP's"), equipment vendors, and carriers throughout North America.

NENA has consistently worked with CTIA, PCIA, and the wireless carriers in general to enhance the ability of wireless phones to dial 9-1-1 from anywhere regardless of the frequencies used and the air interface selected by the wireless carriers. The rules as currently written, specify three methods of programming phones to dial 9-1-1 when they are in the analog mode. This includes the Nokia multi-mode phone when they are operating in the analog mode.

NENA supports the existing on-going multi-mode phones and dual mode analog/digital cellular phones to attempt to reach a 9-1-1 PSAP in the most expedient manner. To that extent, we agree with Nokia that digital frequencies should be tried first, where they exist, before trying to pass the call on an analog channel. NENA has never requested this step to be eliminated on 9-1-1 calls thus forcing the phone to make 9-1-1 calls in the analog mode only. To do so, would deny the public's ability to call 9-1-1 on digital channels, which typically have greater capacity.

NENA observes the Nokia proposal to be a repeat of previous issues, with the exception of the exact timing and sequencing of calls, which needs further study in a technical setting. Time permitting, NENA would be willing to work with Nokia and the cellular industry to review the exact sequence Nokia is proposing. NENA fully expected that the wireless carriers would attempt to pass 9-1-1 calls on their preferred method before the wireless digital phone switches over to analog in which the existing rules cover. However, to formalize it as Nokia is requesting could be an important step forward.

A very important issue, which appears to be overlooked in these proceeding, is the PSAP's ability to call back the 9-1-1 caller. It has come to NENA's attention

most recently, that many if not all of the wireless carriers have programmed their wireless phones to receive calls on only their preferred PCS, or “A” or “B” side carrier. This severely reduces the PSAP’s ability to call back a 9-1-1 caller, which is one of the basic issues driving Phase I ANI and Phase II ANI/ALI.

The existing rules certainly increase the possible of making a 9-1-1 call from a wireless device. However, much can and will be lost if PSAPs across the nation cannot make return calls to these phones. PSAPs can call back wireline callers - they need to be able to call back wireless callers. We need not make the well-established point here that Safety is a major reason driving the success of wireless phones.

We would like to take this opportunity to request that the commission review this issue and consider a public comment mechanism to solicit advice for this issue. We need to make it possible for PSAPs to return 9-1-1 calls to all wireless phones, regardless of the carrier’s preferred programming. As it stands now, if the phone did not make the 9-1-1 call on the preferred carrier, the PSAP will probably not be able to return the call. If this issue is not rectified, we will lose much of the value of wireless ANI.

We respectfully submit that the Commission needs to stay squarely focused on the general theme of these proceedings that when regarding 9-1-1 and wireless phones, we need to require that wireless phones perform as close as possible to wireline phones. If not, countless lives will be lost as more and more people depend on these phones for their safety.

We hope these comments will help the Commission through this very important process and NENA applauds the Commission’s devotion to all of the 9-1-1 wireless issues.

Respectfully submitted,

NATIONAL EMERGENCY NUMBER ASSOCIATION

By_____

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November 30, 1999